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DIVISION OF AIR POLLUTION CONTROL
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EARL D. RAY, P.E.
COMMISSIONER

August 14, 1985

Mr. Anthony Wayne, Chief Enforcement
Region VII, EPA
324 East Eleventh
Kansas City, Missouri 64106

Re: GAF Bldg. Products Div., 9215 Riverview, St. Louis, MO

Dear Tony:

This company for several years manufactured asbestos based siding. They ceased this operation several years ago, sealed off the rear portion of the plant where asbestos mixing, extruding, drying, etc. had been done and used the front portion of the building to manufacture polyurethane foam insulation panels. There was much accumulation of asbestos laden dust on the ledges, rafters, supports, etc. in the rear sealed off section of the building.

OHSA got on them claiming there was leakage of this dust into the occupied part of the building causing employee exposure to asbestos. At OHSA's request, we checked the building out but found no leakage of dust to the exterior of the building.

Recently we visited the plant to make a compliance monitoring inspection of the polyurethane manufacturing operations and found that the plant has now been completely vacated. The only employee remaining, a combination security guard-building maintenance man, advised that all of the asbestos laden dust had been removed from the building earlier this year and that "EPA" had supervised this removal. It was probably OHSA, not EPA.

In any event, we had never been notified of intent to remove the asbestos and did not monitor its removal. Inspection showed that a good job of cleaning it up had been done. Since this was not a case of removing asbestos insulation from structures, pipes, boilers, tanks, etc. I assume NESHAPS Regulation does not apply.

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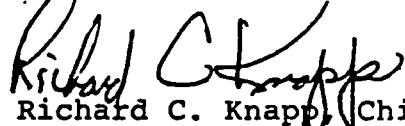
EPA-REG. VII

Mr. Anthony Wayne

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If you concur then I guess there is no cause for further action but I thought you should be aware of it just in case.

Very truly yours,


Richard C. Knapp, Chief
Field Enforcement

RCK/kln

cc: Rancy Hastings, Chief Enforcement
Air Program, MO Dept. of Natural Resources